

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

FILED

MAY 21 2024

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
E. ST. LOUIS OFFICE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRANDON S. MILLER, JR.,
KAMERON M. JOHNSTON,

Defendants.

CRIMINAL NO. 24-CR-30054-SMY

Title 18
United States Code,
Section(s) 2, 922, 924, 932, 933

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

CONSPIRACY TO COMMIT STRAW PURCHASING OF FIREARMS

Between on or about November 16, 2022 and about January 20, 2024, in St. Clair County, Illinois, within the Southern District of Illinois,

BRANDON S. MILLER, JR. & KAMERON M. JOHNSTON

did knowingly combine, conspire, and agree with each other to knowingly purchase firearms, in or otherwise affecting interstate or foreign commerce for, on behalf of, or at the request or demand of **BRANDON S. MILLER, JR.**, knowing or having reasonable cause to believe that **BRANDON S. MILLER, JR.** intended to use, carry, possess or sell or otherwise dispose of the firearm in furtherance of a felony, Illegal Possession of a Machinegun, in violation of 18 U.S.C. 922(o), in violation of Title 18, United States Code, Sections 932(b)(2) and 932(c)(2) and Title 18, United States Code, Section 2.

COUNT 2

FALSE STATEMENT DURING PURCHASE OF A FIREARM

On or about the 25th day of April, 2023, in the Southern District of Illinois, the defendant,

KAMERON M. JOHNSTON

in connection with the acquisition of a firearm, a Glock 20, 10 mm pistol bearing S/N BXZL111, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to the licensed dealer, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented that he was the actual transferee/buyer of said firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 3
TRAFFICKING IN FIREARMS

Between on or about the 25th day of April, 2023 and January 20, 2024, in the Southern District of Illinois, the defendant,

BRANDON S. MILLER, JR.

did receive from another person, in or otherwise affecting interstate or foreign commerce, a firearm, to wit: a Glock model 20, 10 mm pistol bearing S/N BXZL111, knowing or having reasonable cause to believe that such receipt would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(2) and 933(b).

COUNT 4
FALSE STATEMENT DURING PURCHASE OF A FIREARM

On or about the 15th day of September, 2023, in the Southern District of Illinois, the defendant,

KAMERON M. JOHNSTON

in connection with the acquisition of a firearm, a Glock 35 .40 Smith & Wesson caliber pistol bearing S/N YTR170, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to the licensed dealer, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that

the defendant represented that he was the actual transferee/buyer of said firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 5
TRAFFICKING IN FIREARMS

Between on or about September 5, 2023, and September 19, 2023, in St. Clair County, Illinois, within the Southern District of Illinois,

BRANDON S. MILLER, JR.

did receive from another person, in or otherwise affecting interstate or foreign commerce, a firearm, to wit: a Glock model 35, .40 Smith & Wesson caliber pistol bearing S/N YTR170, knowing or having reasonable cause to believe that such receipt would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(2) and 933(b).

COUNT 6
FALSE STATEMENT DURING PURCHASE OF A FIREARM

On or about the 8th day of December, 2023, in the Southern District of Illinois, the defendant,

KAMERON M. JOHNSTON

in connection with the acquisition of a firearm, a Glock 21 pistol chambered in .45ACP bearing S/N UNZ518, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to the licensed dealer, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented that he was the actual transferee/buyer of said firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 7
STRAW PURCHASING OF FIREARMS

Between on or about the 30th day of November, 2023 and the 13th day of December, 2023, in the Southern District of Illinois, the defendant,

KAMERON M. JOHNSTON

did knowingly purchase a firearm, to wit: a Glock 21 pistol chambered in .45 ACP bearing S/N: UNZ518, in or otherwise affecting interstate or foreign commerce for, on behalf of, or at the request or demand of **BRANDON S. MILLER, JR.**, knowing or having reasonable cause to believe that **BRANDON S. MILLER, JR.**, intended to use, carry, possess or sell or otherwise dispose of the firearm in furtherance of a felony, Illegal Possession of a Machinegun, in violation of 18 U.S.C. 922(o), in violation of Title 18, United States Code, Sections 932(b)(2) and 932(c).

COUNT 8
ILLEGAL POSSESSION OF A MACHINEGUN

On or about January 20, 2024, in St. Clair County, within the Southern District of Illinois,

BRANDON S. MILLER, JR.,

defendant herein, did knowingly possess a machinegun, in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

FORFEITURE ALLEGATIONS

1. As a result of the commission of the offenses described in Count 1, 3, 5, and 7 of this Indictment, **BRANDON S. MILLER, JR. and KAMERON M. JOHNSTON**, defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) by Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Sections 934(a)(1)(A) and (B), all firearms and ammunition involved in or used in any knowing violation of the offenses described in Counts, 1, 3, 4, and 7 of this Indictment, as well as any property constituting proceeds from said offenses.

2. As a result of the commission of the offense described in Count 8 of this Indictment, **BRANDON S. MILLER, JR. and KAMERON M. JOHNSTON**, defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) by Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in or used in any knowing violation of the offenses described in Count 1 of this


Indictment, including, but not limited to, the below listed items:

- a. Glock model 20 10 mm pistol bearing serial number BXZL111, with an installed machinegun conversion device;
- b. Six (6) multi-colored machinegun conversion devices.

A TRUE BILL



John D. A. Tripp
Assistant United States Attorney



RACHELLE AUD CROWE
United States Attorney

Recommended Bond:

MILLER: DETENTION
JOHNSTON: DETENTION